

Exhibit 1 to Complaint –

*The Center for Investigative Reporting and Aura  
Bogado v. U.S. Immigration and Customs  
Enforcement*



Aura Bogado &lt;abogado@revealnews.org&gt;

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**FOIA request: ICE-MVM contract**

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**Aura Bogado** <abogado@revealnews.org>  
To: ice-foia@dhs.gov

Tue, Nov 27, 2018 at 6:54 AM

A copy of this request is attached as a Word document

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November 27, 2018

U.S. Immigration and Customs Enforcement  
Freedom of Information Act Office  
500 12th Street, S.W., Stop 5009  
Washington, D.C. 20536-5009

To Whom It May Concern:

This is a request under the Freedom of Information Act (henceforth "FOIA"). I'm a reporter with the Center for Investigative Reporting ("CIR") seeking information from Immigration and Customs Enforcement ("ICE") regarding documents maintained by ICE.

On July 3, 2018, ICE press secretary Jennifer Elzea referred to the existence of a contract between the agency and MVM, Inc. In an email, Elzea wrote, "According to the U.S. Immigration and Customs Enforcement (ICE) contract with MVM, Inc. the company is authorized to use their office spaces as waiting areas for minors awaiting same-day transportation between U.S. Customs and Border Protection custody and U.S. Health and Human Services custody. These offices are not overnight housing facilities, per the contract with ICE."

When I asked Elzea for a copy of this contract, she wrote I would "need to submit a FOIA request (or search our FOIA reading room) for a full version of the contract document."

I hereby request a copy of the contract between ICE and MVM that Elzea suggested I request. The contract would have been signed between ICE (or its representatives) and MVM (or its representatives) as early as 2014, although it may have been modified at a later time. The substance of the contract references the use of MVM office areas as waiting areas for minors awaiting same-day transportation.

**Fee Waiver and Fee Benefit:**

CIR is the nation's oldest nonprofit news organization. As a member of the news media, I'm seeking this information for dissemination to the general public as part of an effort to understand how minors are detained by private contractors. As such, I'm requesting a fee waiver of search and review fees as a member of the news media. 5 U.S.C. § 552(a)(4)(A)(iii). This request is made in the public interest and not for commercial use. For additional details about Reveal, please see our website:

<<https://www.revealnews.org/>>. If possible, I would prefer the documents in electronic format. Please notify me before incurring any photocopying costs over \$100.

**Electronic Records:**

Please furnish all responsive records in electronic, searchable format delivered to my email address: [abogado@revealnews.org](mailto:abogado@revealnews.org). If that's not possible, please send records on a CD-ROM sent to the following address:

Aura Bogado  
1400 65th St., Suite 200  
Emeryville, CA 94608

Further Correspondence:

All correspondence regarding this request can be directed to me at [abogado@revealnews.org](mailto:abogado@revealnews.org).

Please be aware that under 5 U.S.C. § 552(a)(6)(A), a FOIA request is considered constructively denied after twenty business days and is subject to litigation on that basis. If my request is denied in whole or part, I ask that you justify all deletions by reference to specific exemptions of the act. As the law requires, I will also expect you to release all segregable portions of otherwise exempt exempt material.

I reserve the right to appeal your decision to withhold any information or to deny a waiver of fees.

If you have any questions, do not hesitate to contact me at 323-202-9895.

Thank you for your prompt attention to this request.

Sincerely,  
Aura Bogado

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Aura Bogado  
Reporter  
[abogado@revealnews.org](mailto:abogado@revealnews.org)



from The Center for Investigative Reporting  
[@aurabogado](https://twitter.com/aurabogado) | [podcast](#) | [website](#)



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